

1 WRIGHT, FINLAY & ZAK, LLP
2 Matthew S. Carter, Esq.
3 Nevada Bar No. 9524
4 7785 W. Sahara Avenue, Suite 200
5 Las Vegas, Nevada 89117
(702) 475-7964; Fax: (702) 946-1345
mcarter@wrightlegal.net
Attorneys for Defendant, Select Portfolio Servicing, Inc.

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 DAVID A. BELL, GAIL P. BELL, and others
9 similarly situated,

10 Plaintiffs,

11 vs.

12 SELECT PORTFOLIO SERVICING, INC.,

13 Defendant.

Case No.: 2:18-cv-00475-JAD-NJK

**AMENDED STIPULATION AND
ORDER TO EXTEND DEADLINE FOR
SELECT PORTFOLIO SERVICING,
INC. TO FILE ITS RESPONSE TO THE
COMPLAINT**

(SECOND REQUEST)

14 IT IS HEREBY STIPULATED between Plaintiffs, David A. Bell and Gail P. Bell
15 (“Plaintiffs”), by and through their attorneys of record, David H. Krieger, Esq. of the law firm
16 Haines & Krieger, LLC and Matthew I. Knepper, Esq. of the law firm Knepper & Clark LLC,
17 and Defendant, Select Portfolio Servicing, Inc. (“SPS”), by and through its attorney of record,
18 Matthew S. Carter, Esq. of the law firm Wright, Finlay & Zak, LLP, the parties agree to extend
19 the deadline for SPS to file a response to the Complaint to April 20, 2018. The reason for the
20 requested extension is that Defendant retained its attorneys in this matter the week of April 2,
21 2018, and Defendant’s counsel was unable to fully review and respond to the complaint by the
22 original deadline of April 6, 2018. Defendant’s counsel conferred with Plaintiff’s counsel
23 regarding this issue, and Plaintiff’s counsel agreed to grant the professional courtesy of an
24 extension so that a proper response could be filed and this case progress in the most efficient
25 manner possible. Accordingly, the thorough preparation of the response and the resulting
26 efficiency of this litigation process constitute good cause for the requested extension. This
27 request is being made after the expiration of the deadline due to the court’s denial without
28 prejudice of the first request, which was timely filed before the deadline for Defendant’s

1 response, though it did not fully explain the reasons for the extension of time to answer. Given
2 the parties' actions to ensure that that time for filing was extended pursuant to the rules, there
3 was no failure to file a timely request under the rules. To the extent that the first request omitted
4 the reason for that request, the parties' agreement was in good faith and any omission was the
5 result of excusable neglect.

6 This is the parties' second request for an extension and is not intended to cause any delay
7 or prejudice to any party.

8 IT IS SO STIPULATED.

9 DATED this 9th day of April, 2018.

DATED this 9th day of April, 2018.

11 /s/ Matthew I. Knepper, Esq.

12 David H. Krieger, Esq.
13 HAINES & KRIEGER, LLC
14 8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123

15 Matthew I. Knepper, Esq.
16 Miles N. Clark, Esq.
17 KNEPPER & CLARK LLC
10040 W. Cheyenne Ave., Ste. 170-109
Las Vegas, NV 89129

18 *Attorneys for Plaintiffs, David A. Bell and*
19 *Gail P. Bell*

/s/ Matthew S. Carter, Esq.

Matthew S. Carter, Esq.
WRIGHT, FINLAY & ZAK, LLP
7785 W. Sahara Avenue, Suite 200
Las Vegas, Nevada 89117
Attorneys for Defendant, Select Portfolio
Servicing, Inc.

20 IT IS SO ORDERED.

21 Dated: April 10, 2018

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UNITED STATES MAGISTRATE JUDGE
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